

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

ACADIA INSURANCE COMPANY, as :  
Subrogee of St. Paul Street, LLC :  
:  
Plaintiff :  
v. :  
:  
NER CONSTRUCTION MGMT., INC. :  
:  
Defendant :

CIVIL ACTION NO.  
04-12557-WGY

FILED FEE PAID:  
RECEIPT # 65626  
AMOUNT \$ 50.00  
BY DPTY CLK [Signature]  
DATE 7/18/05

NOW COMES, Patrick J. Loftus, III, Esquire, counsel for Plaintiff Acadia Insurance Company as subrogee of St. Paul Street, LLC respectfully moves this Court to enter an Order, in the form attached, for the admission Pro Hac Vice of Daniel J. Luccaro, Esquire, of the law firm of Cozen and O'Connor, 1900 Market Street, Philadelphia, Pennsylvania to appear herein as counsel for plaintiff.

In support of this motion, Movant states as follows:

1. I am an attorney duly licensed to practice law in the Commonwealth of Massachusetts, and maintain an office at 9 Park Street, #500, Boston, Massachusetts 02108, and am attorney for plaintiff in the above-captioned action.
2. The above-captioned action involves property damage resulting from an incident that occurred on January 31, 2004 at the plaintiff's insureds' property in Brookline, Massachusetts.
3. I have been acting as counsel for plaintiff with respect to this matter.
4. As counsel for plaintiff, I have cooperated with Mr. Luccaro, who has also prepared the case and is also ready to proceed with discovery and trial.

5. I know Mr. Luccaro to be a qualified attorney with experience in the area of property damage litigation, such issues being presented in the instant lawsuit, and to be a member in good standing of the Bar of the Commonwealth of Pennsylvania and the State of New Jersey.

6. With my assistance, Mr. Luccaro has prepared this case and is ready to go forward, such that granting this motion will not delay the preparation at trial of this case. Mr. Luccaro is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

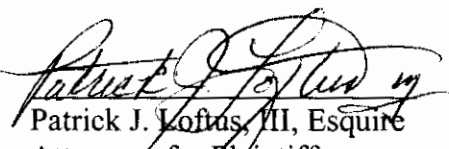
7. The Commonwealth of Pennsylvania grants Pro Hac Vice admission to duly licensed attorneys from the Commonwealth of Massachusetts.

8. In further support of its motion, Movant incorporates, by reference, the annexed Affidavit of Daniel J. Luccaro, Esquire.

WHEREFORE, Movant respectfully requests that the Court grant an Order allowing the admission Pro Hac Vice of Daniel J. Luccaro, Esquire to practice with respect to the above entitled action.

LAW OFFICES OF PATRICK J. LOFTUS,  
III

BY:

  
Patrick J. Loftus, III, Esquire  
Attorneys for Plaintiff  
9 Park Street, #500  
Boston, MA 02108  
617.723.7770

Dated: July 12, 2005

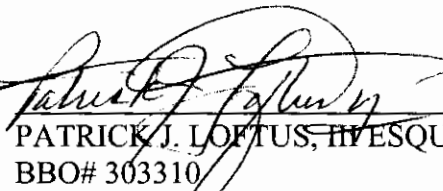
**CERTIFICATE OF SERVICE**

I, PATRICK J. LOFTUS, III, hereby certify that a copy of the foregoing Plaintiff's MOTION FOR ADMISSION OF COUNSEL PRO HAC VICE has been served upon counsel this 12 day of July, 2005 by First Class Mail, postage pre-paid as follows:

Conrad J. Bletzer, Jr.  
Bletzer & Bletzer P.C.  
300 Market Street  
Brighton, MA 02135

Attorney for Defendants

BY:

  
PATRICK J. LOFTUS, III ESQUIRE  
BBO# 303310  
9 Park Street, Suite 500  
Boston, MA 02108  
(617) 723-7770  
ATTORNEY FOR PLAINTIFF